
Wednesday, 19 October 2022
24th of Tishrei, 5783

**Re: Emergency Motion to Modify Bond Conditions & Recusal
(Assisting with Hurricane recovery & Mailing Books to Prisoners)**

Your Honor,

The Government was ordered (Dkt. 333) on Oct 6, 2022 to provide the Court a proposed order to Teman's Emergency Motion filed on Sep 30, 2022. Given it is now 10/19/2020, meaning significant time where JCorps could volunteer with Hurricane Ian has been lost, as well as time for the Defendant to travel for medical procedures and consultations, the Defendant respectfully requests the Court issue the following order.

As well, Defendant's companies' clients have asked that they be able to pay their monthly fees (Which range generally from \$49.99 to \$199 per month) via debit or credit card, saying that it is difficult for them to pay by check for such services. Similarly, it would be a huge help if JCorps can collect monthly donations from volunteers and donors to cover supplies and hopefully hire staff to help organize events. Therefore, I have added a paragraph allowing monthly fees for these services as well as donations, and respectfully request the Court authorizes this. I previously asked Mr. Bhatia and received no response. Because intercoms are critical to the properties (such as to admit nurses, deliveries of food and medicine, visitors, residents, etc.) we ask that Your Honor make it easier for clients to keep their payments current and their services active.

Thank you,



Ari Teman defendant Pro Se

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES

V

ARI TEMAN, Defendant

19-CR-696 (PAE)

PAUL A. ENGELMAYER, District Judge:

The Government was ordered (Dkt. 333) on Oct 6, 2022 to provide the Court a proposed order to Teman's Emergency Motion filed on Sep 30, 2022. Given it is now 10/19/2020, meaning significant time where JCorps could volunteer with Hurricane Ian has been lost, as well as time for Mr. Teman to travel for medical procedures and consultations, the Court issues the following order:

Defendant may travel throughout New Jersey, Florida, and New York for medical procedures, family and religious visits, and volunteering. He must maintain phone and email communication with his supervising officer. He must provide his supervisor with flight numbers (where applicable), hotel or housing (if staying with family or friends) locations, and be available by video chat (Whatsapp or Skype) on request to confirm his location. Defendant may not travel until he receives written permission from Pretrial Services for that specific trip via email, and must provide all requested information to Pretrial Services in-order to receive such information. Pretrial Services is to give its approve to such travel except where it finds Teman's documentation wanting or where it reasonably identifies a concern with the proposed travel (e.g. that the length of travel exceeds the purpose identified, or that the travel raises concerns about the well-being or safety of Teman or others or Teman's future appearance.)

Defendant may distribute books to prisoners, provided of course he acts within the rules and regulations of the respective prisons and jails.

Because defendant's clients have complained that it is difficult for them to pay by check for cloud-based services such as GateGuard and SubletSpy and PropertyPanel, which have always advertised they are a monthly fee-based services (for example, GateGuard advertises on its homepage a monthly fee, and its invoices, including those in evidence, make clear it is a multi-year contract), and because JCorps, the volunteer network, would benefit from monthly donations, Defendant's companies may charge recurring monthly or yearly fees from their existing and new clients, via debit card or credit card, or via a service such as Stripe or PayPal. This will enable clients who use the GateGuard intercom, for example, to maintain their service without interruption due to missed payments, which will enable the thousands of residents across the country who rely on GateGuard to admit guests and deliveries to do so without interruption, and for volunteers and donors to support JCorps as it increases its volunteer activities.

Teman's company's may not use RCCs. If a client asks for recurring payments to stop in writing (via email or letter), Teman's companies must pause the payments and invoice instead for payment by check. If a client wishes to pay in 3-month or 6-month or 12-month recurring installments, they may do so.

SO ORDERED,

PAUL A. ENGELMAYER
United States District Judge

DATED: October 20, 2022
New York, New York